

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLOS MUNOZ, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

V.

CHINA EXPERT TECHNOLOGY, INC.,
ZHU XIAOXIN, HUANG TAO and FU
WAN CHUNG

Defendants.

DOCKET NUMBER: 07-cv-10531-AKH

HON. ALVIN K. HELLERSTEIN

MOTION OF THE GROS GROUP TO CONSOLIDATE ALL FUTURE RELATED ACTIONS; TO BE APPOINTED LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL

The Gros Group (or “Movants”) respectfully moves this Court for an order: (1) consolidating all future related actions; (2) appointing Movants as Lead Plaintiffs in this action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (3) approving its selection of the law firm of Kahn Gauthier Swick, LLC (“KGS”), as Lead Counsel for the Class.

The Gros Group makes this Motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because:

1. it has the largest financial interest in the relief sought by the Class and has incurred substantial losses in the amount of \$70,867.50 as a result of its members’ purchases of China Expert Technologies, Inc. stock during the Class Period, and
2. it satisfies the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The Gros Group further requests that the Court approve the selection of its counsel, KGS, as Lead Counsel for the Class. KGS is a nationally-recognized law firm with significant class action, fraud, and complex litigation experience, and is a firm with the resources to effectively and properly pursue this action.

WHEREFORE, for all of the reasons set forth herein and in the Memorandum of Law and the Miller Declaration submitted herewith, the Gros Group respectfully request that this Court: (1) consolidate all future related actions with the instant case; (2) appoint the Gros Group as Lead Plaintiffs pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the PSLRA; (3) approve the Gros Group’s selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: January 22, 2008

Respectfully submitted,

KAHN GAUTHIER SWICK, LLC

/s/ Kim E. Miller

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And

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*Counsel for the Gros Group and Proposed
Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on January 22, 2008.

/s/ Kim E. Miller
Kim E. Miller

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**[PROPOSED] ORDER CONSOLIDATING ALL FUTURE RELATED ACTIONS;
APPOINTING LEAD PLAINTIFF; AND APPROVING PROPOSED LEAD
PLAINTIFF'S CHOICE OF COUNSEL**

Having considered the motion of the Gros Group to consolidate all future related actions, to be appointed Lead Plaintiff, and to approve proposed Lead Plaintiff's choice of counsel, and all papers in support thereof and in opposition thereto, and oral argument, if any, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. The Gros Group is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Kahn Gauthier Swick, LLC is hereby appointed Lead Counsel for Lead Plaintiffs and the Class.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE